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State of Wisconsin
Governor Scott Walker



TO: **W-2 Agencies
Training Staff**

FROM: Margaret McMahon, Director
Bureau of Working Families
Division of Family and Economic Security
Department of Children and Families

BWF OPERATIONS MEMO

No: 17-02 **(Amended)**

DATE: ~~4/30/2017~~ 05/10/2017

W-2	<input checked="" type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input checked="" type="checkbox"/>	RAP	<input type="checkbox"/>	Other EP	<input type="checkbox"/> *

**SUBJECT: Social Security Number (SSN) Case File Documentation for
Wisconsin Works (W-2)**

CROSS REFERENCE: Operations Memo [13-08](#): *State Online Query Internet Process (SOLQ-I) and Automatic Update of Social Security Information in CWW*
Operations Memo [15-04](#): *CARES Worker Web Enhancement to Require a Social Security Number or a Social Security Number Application Date*
Operations Memo [16-14](#): *Exception to W-2 SSN/SSN Application Date Policy for Certain Qualified Non-Citizens*
W-2 Manual [Section 2.7.1 Providing Social Security Numbers](#)
W-2 Manual [Section 4.1.2 Information Requiring Eligibility Verification](#)

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this memo is to:

1. Remind Wisconsin Works (W-2) agencies of ways to verify and document the Social Security Number (SSN) or SSN Application Date of all W-2 Group members, including non-citizens and newborns;
2. Provide W-2 agencies with a desk aid, improved policy, and CARES Worker Web (CWW) reminders to ensure that SSNs and SSN Application Dates for all W-2 Group members are entered in CWW; and
3. Notify W-2 agencies of an upcoming SSN report that agencies will be required to complete.

BACKGROUND

In every audit since 2010, the Legislative Audit Bureau (LAB) has found that some W-2 Agencies are not processing W-2 eligibility correctly by not verifying the SSN for all W-2 Group members. The Bureau of Working Families (BWF) also conducted an internal review of the SSN Application Date verification in CWW and found numerous cases with verification codes that do not align with W-2 policy.

In March 2015, CWW was enhanced to support existing policy which requires all members of a W-2 group to provide either an SSN or an SSN Application Date. [Operations Memo 15-04](#) described the system enhancements and reminded W-2 agencies of the existing policy. In August 2016, BWF issued [Operations Memo 16-14](#) identifying which qualified non-citizens are initially exempt from providing an SSN or SSN Application Date.

POLICY

W-2 Manual [Section 2.7.1](#) states that **every** member of the W-2 Group, including newborns, must provide an SSN, or provide proof that any W-2 Group member without an SSN has applied for one, unless the individual is initially exempt. An individual is initially exempt if he or she does not have an SSN, does not have a work authorization, and is a member of one of the following qualified non-citizen groups:

1. Cuban/Haitian entrants, as defined in section 501(e) of the Refugee Education Assistance Act of 1980; or
2. Certified, foreign-born victims of trafficking; or
3. Parolees (alien paroled into the U.S. for at least one year under section 212(d)(5) of the Immigration and Nationality Act); or
4. Certain battered aliens who meet the requirements of 8 U.S.C. 1641(c); or
5. Any qualified non-citizen (see [2.4.2](#)) who cannot apply for an SSN until his or her immigration status paperwork has been revised.

An individual who is initially exempt must continue to complete the necessary steps for obtaining an SSN in order to remain eligible for W-2. W-2 agencies must assist the individual with these steps if the individual requires assistance. (See [4.1.3](#))

There are no changes to this policy. Agencies who have refugees with errors on their I-94 documents should continue to use the workaround described in [Operations Memo 16-14](#).

Currently, W-2 Manual [Section 4.1.2](#) does not clearly identify which form(s) of verification are allowed for the SSN and which forms of verification apply only to the SSN Application Date. Section 4.1.2 will be clarified to separate the verification sources for persons with an SSN and those who have made application for an SSN and are reporting an SSN Application Date. Section 4.1.2 will also be revised to include Social Security Administration (SSA) Documents and the SOLQ-I data exchange as valid forms of verification. These additions are highlighted in yellow below.

Current Policy: The following chart from W-2 Manual Section 4.1.2 shows valid verification for the SSN or SSN Application Date:

Eligibility Criteria	Suggested Sources of Verification	ECF Code
Social Security Number or Proof of Social Security Number Application (verify only once)	Social Security Card Pay stub displaying the Social Security number W-2 Tax Form displaying the Social Security number Form SS-5, Application for Social Security number Hospital discharge letter (must specifically reference the application for an SSN) Other reliable documents displaying both the name and SSN **IEVS Match from verbal statement of the applicant's Social Security number (SSN)	SSN
		Not Applicable

New Policy: The following will replace the existing chart in W-2 Manual Section 4.1.2.

Eligibility Criteria	Suggested Sources of Verification	ECF Code
Social Security Number (SSN) (verify only once)	Data Exchange verifying verbal statement of individual's SSN Note: This is the preferred form of verification for SSN. If the data exchange returns a "V-Verified" from the SSA, there is no need to scan paper verification into ECF.	Not Applicable
	The following documents may be used as verification if the data exchange is unavailable or results in a discrepancy and must be scanned into ECF: <ul style="list-style-type: none"> • Social Security Card • Pay stub displaying the Social Security number • W-2 Tax Form displaying the Social Security number • Other reliable documents displaying both the name and SSN 	SSN
SSN Application Date (verify only if individual does not have SSN)	Form SS-5, Application for Social Security number SSA Document (e.g. receipt for SSN Application) Other Written Statement or Agency Form stating that the individual has applied for an SSN For newborns only: Hospital discharge letter (must specifically reference the application for an SSN)	SSN
	For exempt qualified non-citizens: See 2.7.1 and Ops Memo 16-14	Not Applicable

As described in [Operations Memo 13-08](#), CWW has a data exchange with the SSA to verify an individual's SSN. This should be the preferred method of verification if applicants or participants know their SSNs. If the State Online Query Internet (SOLQ-I) data exchange is used to verify an individual's SSN, no documentation is required in the Electronic Case File (ECF).

If the individual does not know the SSNs of all of the W-2 Group members or if the data exchange results in a discrepancy, the Financial and Employment Planner (FEP) must manually verify the SSN and resolve all discrepancies. W-2 Manual [Section 4.1.2](#) describes types of verification for SSN and SSN Application Date. A desk aid is attached to this Operations Memo to assist W-2 agencies in verifying SSNs, SSN Application Dates, and resolving SSN discrepancies. If the individual does not provide the verification of the SSN or SSN Application Date by the due date, including extensions when necessary, the FEP must fail the W-2 case for failing to provide information.

CWW

There are no changes to CWW associated with this memo. The following are reminders for obtaining and verifying the SSN or SSN Application Date as part of the intake or person add driver flow process.

1. If the individual knows his or her SSN, and the SSNs of the other W-2 Group members, the FEP must enter the SSN on the **Household Members** page and choose '**C-COMPLETED REQUIREMENTS**' from the **SSA Verification** drop-down menu. This will allow the SOLQ-I data exchange to verify the SSN(s) with SSA.

- **Note:** If '**X-EXCLUDED**' is already entered in the **SSA Verification** field, the FEP must replace this with '**C-COMPLETED REQUIREMENTS**'. BadgerCare Plus allows certain individuals to be exempt from providing SSNs; W-2 does not recognize this selection for any reason. '**X-EXCLUDED**' should **not** be entered for the non-citizen groups identified previously (see [Operations Memo 16-14](#)).

Household Members

Cancel ☐ Reset

Completed 0 of 1

Current Household Members			
MOM SSN 29F PP			
Effective Period			
Last Updated:		11/30/2016	
Delete:	<input type="checkbox"/>	Delete Reason:	<input type="text"/>
Individual Name			
*First Name	MI	*Last Name	Suffix
MOM		SSN	
Additional Information			
*Gender:	FEMALE		
SSN:	<input type="text"/>		
*Birth Date:	MM	DD	YYYY
	11	16	1987
SSA Verification:		<div> * - NAME MATCH, SSN MISMATCH 1 - SSN NOT ON FILE 3 - NAME MATCH, DOB MISMATCH 5 - NAME MISMATCH; DOB CHECKED C - COMPLETED REQUIREMENTS V - VERIFIED W - WORKER VERIFIED X - EXCLUDED </div>	
SSN Override Verification:			
*Verification:			

If the SOLQ-I data exchange is successful, the **SSA Verification** field will populate with '**V-VERIFIED**' after the FEP navigates off the **Household Members** page. If the data exchange is not successful, the FEP will receive an alert and the **SSA Verification** field will be populated with one of the following results:

- ***-NAME MATCH, SSN MISMATCH;**
- **1-SSN NOT ON FILE;**
- **3-NAME MATCH, DOB MISMATCH;** or
- **5-NAME MISMATCH, DOB CHECKED.**

All of these will result in an SOLQ-I discrepancy which will create work items that the W-2 Agency must resolve. The FEP must contact the individual to verify that the information provided was correct (e.g. not a data entry error) and request that the individual bring in paper verification (e.g. SSN card). The FEP must pend and issue a Verification Checklist (VCL) to the individual and inform them of the 7 working days due date.

When the individual brings in verification of the SSN, the FEP must scan the information into ECF under ECF code "SSN", update the SSN information on the **Household Members** page, and choose '**C-COMPLETED REQUIREMENTS**' to re-engage the SOLQ-I data exchange. This data exchange must return a '**V-VERIFIED**' in order for other data exchanges, including the Unemployment Insurance Benefits (UIB) and State Wage Income Collection Agency (SWICA) data exchanges, to run. If the individual does not provide the verification of the SSN or SSN Application Date by the due date, including extensions when necessary, the FEP must fail the W-2 case for failing to provide information. The FEP does not need to send out a noncooperation notice for failing to provide an SSN; CWW will generate the notice of case closure or denied W-2 Application.

- **Note:** Occasionally, when the FEP enters the SSN on the **Household Members** page, chooses '**C-COMPLETED REQUIREMENTS**' from the **SSA Verification** drop-down menu, and clicks Next, CWW displays an error message:
- GL086: MCI did not process the request. Please call the help desk and provide the MCI error code '00053'; or
 - AE201: An individual with the same SSN already exists in the system.

When the FEP receives these errors, they must contact the W-2 CARES Help Desk to resolve the issue. There are two workarounds that the agency may use while waiting for the Help Desk to resolve the issue:

- a. If the individual provides verification of the SSN, FEPs may enter the known SSN and use the '**W-WORKER VERIFIED**' as a workaround until the issue is resolved. FEPs must scan the verification into ECF and document in case comments that there was a system error and that '**W-Worker Verified**' was entered as a temporary workaround.
- b. If the individual does not have verification of the SSN, FEPs must pend for verification by clearing the SSN provided and selecting '**?-Not Yet Provided**' in the SSN Override Verification field. FEPs must document in case comments that there was a system error and that '**?-Not Yet**

Provided was entered to request verification of the SSN from the individual.

Once the FEP has been notified by the W-2 Help Desk that the issue has been resolved, the FEP must return the Household Members page, enter the SSN (if removed previously), and change the **SSA Verification** field to '**C-COMPLETED REQUIREMENTS**'.

2. If the individual or any member of the individual's W-2 Group has an SSN, but does not know it and does not have paper verification, the FEP must use the **SSN Override Verification** field to pend for the individual's SSN. There are only two options that a W-2 FEP may choose in the **SSN Override Verification** field: '**?-Not Yet Provided**', if the individual needs to find the SSN, or '**F-Failed to provide information**', if the individual refuses to provide the SSN or verification of the SSN. If the individual refuses to provide verification of his or her SSN, or the SSN of any non-exempt W-2 Group member, the W-2 Group is ineligible for W-2.

The screenshot shows a form titled 'Individual Name' with fields for First Name, MI, Last Name, and Suffix. Below this is the 'Additional Information' section, which includes fields for Gender, SSN, Birth Date, SSA Verification, SSN Override Verification, and Verification. A dropdown menu is open for the SSN Override Verification field, showing the following options: '? - Not Yet Provided', 'E - Emergency or Refugee', 'F - Failed to provide information', and 'R - Religious'. The 'Estimates for Relevance Determination' section is partially visible at the bottom.

3. If the individual or any member of the individual's W-2 Group is a refugee or member of the exempt population described previously, the FEP must follow the instructions outlined in [Operations Memo 16-14](#). FEPs must **not** use the '**E-Emergency or Refugee**' in the **SSN Override Verification** field to bypass collection of an SSN. W-2 policy does not recognize any religious exemptions for failing to apply for an SSN. If a worker from a different program has already entered '**E-Emergency or Refugee**' or '**R-Religious**', the FEP must verify or pend for the SSN or SSN Application Date for W-2 eligibility.
4. If the individual or any member of the individual's W-2 Group does not have an SSN, the individual must apply for an SSN. In accordance with W-2 Manual [Section 4.1.3](#), the W-2 Agency must assist the individual with obtaining verification if the individual is unable to obtain the required documentation. The individual has seven working days from the date the verification request is made to provide verification that they have applied for an SSN, which can be extended up to 30 days from the date the W-2 Agency received the signed Application Registration form or the date of the initial request for verification, if necessary. At application or person add, the FEP must enter one of the following dates on the **Permanent Demographics** page:
 - The date the individual applied for an SSN if the date is less than six months in the past; or
 - The current date if the individual has not yet applied for an SSN.

Permanent Demographics

 Cancel ☐ Reset
 Total: 2

Individual Demographic Information			
Effective Period			
Last Updated:		12/09/2016	
Individual Details			
* Individual:	DAD SSN 31M PP		
* Language:	E - ENGLISH		
* Are you a US citizen:	Yes	Verification:	BC - BIRTH CERTIFICATE
		*US Citizenship MA	
Birth Place:		Verification:	
Date Of Death:	MM/DD/YYYY	Source:	
SSN Application Date:	12/01/2016	Verification:	? - NOT YET VERIFIED

If the FEP enters an SSN Application Date that is greater than six months in the past, CWW will display an alert instructing the FEP to pend for the SSN on the **Household Members** page.

Permanent Demographics

 Cancel ☐ Reset

The following events have occurred:

✖ GL325 : Please pend for or enter SSN on the Household Members page.

Completed 1 of 2

Individual Demographic Information			
Effective Period			
Last Updated:		12/09/2016	
Individual Details			
* Individual:	LITTLE SSN 2F DAU		
* Language:	E - ENGLISH		
* Are you a US citizen:	Yes	Verification:	BC - BIRTH CERTIFICATE
		*US Citizenship MA	
Birth Place:		Verification:	
Date Of Death:	MM/DD/YYYY	Source:	
SSN Application Date:	05/15/2016	Verification:	? - NOT YET VERIFIED

Although there are many sources of verification provided in the **Verification** list for SSN Application Date, by W-2 policy the FEP may only choose from the following options:

- **S5 – SS-5 COPY** (Application for SSN);
- **SA – SSA DOCUMENT** (Other documentation from the Social Security Administration indicating that the individual has applied for an SSN);
- **AF – AGENCY FORM** (Form created by the W-2 agency to capture that an individual has applied for an SSN for a newborn);
- **OW – OTHER ACCEPTABLE WRITTEN STATEMENT** (Forms or documents created by other state agencies, hospital staff, or other third party verifying that the individual has applied for an SSN);
- **NQ – NOT QUESTIONABLE** (Only used for exempt individuals as described in W-2 Manual [Section 2.7.1](#));

- **HR – HOSPITAL RECORDS** (Only used for newborns and must specifically reference the application for an SSN);
- **PN – NOT YET VERIFIED FOR W-2 OR CHILDCARE** (Used to pend W-2 for verification that any individual has applied for an SSN); and
- **FN – NEVER VERIFIED FOR W-2 OR CHILDCARE** (Only used to fail W-2 if any individual has refused to apply for an SSN).

All other options in the Verification field are not allowed by W-2 policy for the SSN Application Date. FEPs must not select '**?-NOT YET VERIFIED**' nor '**NV-NOT VERIFIED**' due to the potential impact to other programs, but must instead use '**PN-NOT YET VERIFIED FOR W-2 OR CHILDCARE**' or '**FN-NEVER VERIFIED FOR W-2 OR CHILDCARE**' to pend or fail for W-2. Once an individual has provided verification that the individual has applied for an SSN, FEPs do not need to take further action to verify it until the individual's next review or until 6 months after the SSN Application Date, whichever is later. FEPs must have received and entered proof of an SSN within six months of the individual applying for an SSN. This may be extended up to 30 days from the review date for exempt individuals. Once the FEP has received verbal confirmation of the SSN(s), the FEP must enter the SSN on the **Household Members** page for each member of the W-2 Group, choose '**C-COMPLETED REQUIREMENTS**', then navigate off the **Household Members** page in order to complete the SOLQ-I data exchange. If the individual does not provide verification of the SSN or SSN Application Date by the due date, including extensions when necessary, the FEP must fail the W-2 case for failing to provide the mandated information.

AGENCY ACTION

BWF will send W-2 Agencies a report identifying W-2 cases with invalid or missing SSN or SSN Application Date information. W-2 Agencies must resolve the errors identified in the report no later than February 13, 2017. BWF will send this report to W-2 agencies quarterly. Agencies will have 10 days to respond.

The attached desk aid summarizes the information provided in this memo and is intended as a guide to assist agencies with verifying and documenting each individual's SSN or SSN Application Date. Due to the confidential participant information contained in the report, the Program Integrity and Performance Section will be sending the report to each W-2 Agency in an e-mail. To prevent further LAB findings and ensure compliance with W-2 policy, agencies must use this report to correct current cases and to ensure that FEPs are correctly verifying and documenting SSN or SSN Application Date information as part of ongoing case management.

- **Note:** Changing the SSN Application Date to the current date does not constitute resolution of the missing or inaccurate information. W-2 Agencies must verify if the individual has a valid SSN or has applied for an SSN in the past six months. If the individual has not applied for an SSN and refuses to do so, the W-2 Group is not eligible for W-2.

ATTACHMENT

Updated: [Desk Aid: Completing the Social Security Number Requirements for W-2 Applicants and Participants](#)

CONTACTS

For W-2 Policy Questions in the Balance of State: Bureau of Regional Operations, W-2 Regional Coordinators

For W-2 Policy Questions in Milwaukee: Milwaukee Operations Section Regional Administrators

For W-2 CARES Processing Questions: W-2 Help Desk

DCF/DFES/BWF/ERR